

1 Todd M. Schneider (SBN 158253)
2 Matthew S. Weiler (SBN 236052)
3 Sunny Sarkis (SBN 258073)
4 Mark F. Ram (SBN 294050)
5 **SCHNEIDER WALLACE**
6 **COTTRELL KONECKY LLP**
7 2000 Powell Street, Suite 1400
8 Emeryville, CA 94608
9 Telephone: (415) 421-7100
10 TSchneider@schneiderwallace.com
11 MWeiler@schneiderwallace.com
12 MRam@schneiderwallace.com
13

Jason H. Kim (SBN 220279)
SCHNEIDER WALLACE
COTTRELL KONECKY LLP
300 S. Grand Avenue, Suite 2700
Los Angeles, CA 90071
Telephone: (415) 421-7100
JKim@schneiderwallace.com

11 **THE UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

14 MARK YOUNG, on behalf of himself
and all others similarly situated,

15 Plaintiff,

16 v.

17 SOLANA LABS, INC., THE SOLANA
18 FOUNDATION, ANATOLY
19 YAKOVENKO, MULTICOIN CAPITAL
MANAGEMENT LLC, KYLE SAMANI,
and FALCONX LLC,

20 Defendants.
21
22
23
24
25
26
27
28

Case No. 3:22-cv-03912-JD

**DECLARATION OF MARK YOUNG IN
SUPPORT OF REPLY IN SUPPORT OF
MOTION FOR LEAD PLAINTIFF AND
FOR APPOINTMENT OF LEAD
COUNSEL**

HEARING DATE: October 13, 2022
TIME: 10:00 A.M.
COURTROOM: 11

HONORABLE JUDGE JAMES DONATO

DECLARATION OF MARK YOUNG

I have personal knowledge of the foregoing facts. If called upon I could and would testify to the truth of them. I make this declaration in support of my application to serve as lead plaintiff in the above-captioned action, which is governed by the Private Securities Litigation Reform Act of 1995, Pub. L. No. 104-76, 109 Stat. 737 (1995).

1. I have reviewed the report published on the Crypto Leaks website that I am informed was published on August 26, 2022, as updated. I understand that this report was attached as Exhibit A to the declaration of Rashid Mohammed's counsel. ECF No. 41-2.

2. I was not aware of any of the allegations in this Crypto Leaks report prior to the time it was published.

3. I have no interest in, or relationship with, Ava Labs. I own no tokens, known as AVAX, issued by Ava Labs, and I have never owned AVAX tokens.

4. I have selected Schneider Wallace Cottrell Konecky LLP ("Schneider Wallace") to represent me as lead counsel in this litigation should I be appointed by the Court as lead plaintiff under the PSLRA. My application for lead plaintiff does not request that any other law firm be appointed as lead counsel.

5. If appointed lead plaintiff I will vigorously prosecute claims on behalf of the class and direct Schneider Wallace in its conduct of this litigation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 27th day of September, 2022, in Los Angeles, California.

Dated: September 27, 2022

/s/ Mark Young
Mark Young